

REMARKS

Claims 1-20 are pending in this Application. Claims 2-11, 13, 15, 16, 18, and 19 are allowed.

Applicant gratefully acknowledges the Examiner's indication that claims 12 and 17 would be allowable if rewritten in independent form. However, for at least the reasons discussed below, Applicant respectfully submits that all claims herein are allowable.

Claims 1, 14, and 20 stand rejected under 35 U.S.C. §102(e) as being anticipated by Sayers et al. (US 6,539,237, and hereinafter "Sayers").

Applicant respectfully traverses these rejections in the following discussion.

I. THE CLAIMED INVENTION

The claimed invention (e.g., as defined by exemplary claim 1) is directed to a mobile communication network system.

The mobile communication network system includes a mobile communication network, a plurality of external networks, a plurality of mobile terminals, a plurality of gateways for connecting the external networks and the mobile communication network, and a plurality of radio access points for connecting the mobile terminals to the mobile communication network. When packets are transmitted and received between the mobile terminals, the packets are communicated by way of virtual networks that are provided to correspond to each of the external networks on the mobile communication network.

In a conventional mobile communication network system, as described in the Background of the present Application, tunnels are set between mobile terminals and the gateways with external networks, and all communication is realized by way of these tunnels. When communication is implemented between mobile terminals, packets transmitted by the mobile terminals are transmitted to the gateways with the external networks by way of the tunnels, and then again returned to the mobile terminals of the communication partners from the gateways with the external networks by way of the tunnels (e.g., see Application at page 2, lines 6-12).

As a result this process, the technology of the conventional mobile communication network system suffers from problems like considerable delay of the packets and poor

efficiency of circuit use due to wasted bandwidth within the mobile communication network (e.g., see Application at page 2, lines 13-15).

The claimed invention, however, provides a mobile communication network system which includes a plurality of external networks and a plurality of gateways for connecting the external networks and a mobile communication network, wherein when packets are transmitted and received between the mobile terminals, the packets are communicated by way of virtual networks that are provided to correspond to each of the external networks on the mobile communication network (e.g., see Application at page 4, line 21 – page 5, line 4).

With this structure, packets no longer need to be transferred by way of external network gateways, and the efficiency of circuit use of the access network is improved (e.g., see Application at page 5, lines 18-20).

II. THE PRIOR ART REJECTION

The Examiner alleges that Sayers teaches claims 1, 14, and 20.

Applicant respectfully submits, however, that the alleged reference does not teach or suggest each and every feature of the claimed invention.

That is, Sayers does not teach or suggest, *“the packets are communicated by way of virtual networks that are provided to correspond to each of said external networks on said mobile communication network,”* (emphasis added by Applicant) as recited in claim 1.

The Examiner attempts to equate P-BTS 27-3 (27-3') in Fig. 15 of Sayers to the claimed virtual network (Office Action at page 3, third paragraph). The Examiner, however, is clearly incorrect.

Indeed, P-BTS 27-3 (27-3') in Fig. 15 of Sayers is a device in which the Gatekeeper 41' and the Base Station are combined. Sayers, however, in Figs. 1 and 15, upon which the Examiner bases the rejection (or anywhere else, for that matter), does not teach or suggest the claimed feature in which the virtual networks correspond to each of the external networks in the mobile communication network, as recited in claim 1. Thus, Sayers fails to satisfy the plain meaning of the claim language.

Therefore, the Applicant respectfully submits that Sayers fails to teach or suggest each element of Applicant's claimed invention. Therefore, Applicant respectfully requests the Examiner to reconsider and withdraw this rejection.

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III. FORMAL MATTERS AND CONCLUSION

In view of the foregoing, Applicant submits that claims 1-20, all the claims presently pending in the application, are patentably distinct over the prior art of record and are in condition for allowance. The Examiner is respectfully requested to pass the above application to issue at the earliest possible time.

Should the Examiner find the application to be other than in condition for allowance, the Examiner is requested to contact the undersigned at the local telephone number listed below to discuss any other changes deemed necessary in a telephonic or personal interview.

The Commissioner is hereby authorized to charge any deficiency in fees or to credit any overpayment in fees to Attorney's Deposit Account No. 50-0481.

Respectfully Submitted,

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